IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF NORTH CAROLINA SOUTHERN DIVISION No. 7:23-CV-897

IN RE:)
) UNITED STATES' MOTION (1) FOR
CAMP LEJEUNE WATER LITIGATION) SUMMARY JUDGMENT, AND IN THE
) ALTERNATIVE, (2) PARTIAL
This Document Relates To:) SUMMARY JUDGMENT ON THE
) CAUSAL LINK BETWEEEN
McElhiney v. United States, 7:23-cv-1368) PERCHLOROETHYLENE (PCE) AND
Peterson v. United States, 7:23-cv-1576) PARKINSON'S DISEASE
Rothchild v. United States, 7:23-cv-858)
Sparks v. United States, 7:23-cv-682) Fed. R. Civ. P. 56
Welch v. United States, 7:23-cv-1503)

Pursuant to Federal Rule of Civil Procedure 56(c), the United States submits this (1) Motion for Summary Judgement, and in the alternative, (2) Partial Summary Judgment on the Causal Link between Perchloroethylene (PCE) and Parkinson's Disease. As set forth in the United States' concurrently filed Motions to Exclude, the Plaintiffs' Parkinson's disease ("PD") experts, Drs. Jason Cannon, Amelia Boehme, Michael Freeman, Lucio Costa, Steven Bird, Briana De Miranda, Gary Miller, Kristin Andruska, Heidi Schwarz, and Richard Barbano, provided opinions and testimony on the critical issues of general and specific causation. These experts' opinions and testimony are unreliable and should be excluded.

As explained in the accompanying Memorandum of Law, because all of Plaintiffs' PD experts' opinions and testimony on general and specific causation are unreliable, the five bellwether PD Plaintiffs are unable to satisfy the general and specific causation elements of the Camp Lejeune Justice Act of 2022. Accordingly, the Court should grant summary judgment in favor of the United States on the issue of general and specific causation as to PD in Track 1 and in the above-captioned cases and dismiss all related claims.

In the alternative, this Court should grant partial summary judgment in favor of the United States on the issue of causal link between PCE and PD and dismiss Plaintiffs' claims insofar as they assert a claim as to the causal link between PCE and PD.

Dated: September 10, 2025

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on September 10, 2025, I electronically filed the foregoing using the Court's Case Management/Electronic Case Files system, which will send notice to all counsel of record.

/s/ Cindy M. Hurt CINDY M. HURT